



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 17, 2023

By ECF

Honorable J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Brian Benjamin*, S2 21 Cr. 706 (JPO)

Dear Judge Oetken:

On December 15, 2022, this Court so ordered a request by defendant Brian Benjamin that unredacted copies of his submissions filed in connection with his motion to dismiss—redacted copies of which were publicly filed as Doc. Nos. 52, 53, and 60—be filed under seal in order to facilitate the provision of such material to the U.S. Court of Appeals for the Second Circuit.

Accordingly, out of an abundance of caution and for the reasons previously articulated in connection with the parties' filings, the Government respectfully requests that the Court likewise direct that an unredacted copy of its submission—a redacted copy of which was publicly filed as Doc. No. 54, and included redacted attachments 54-1 through 54-3—be maintained under seal and made available as necessary to the Court of Appeals.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: /s/

Celia V. Cohen
Andrea M. Griswold
Jarrod L. Schaeffer
Assistant United States Attorneys
Tel: (212) 637-2466 / -1205 / -2270

cc: Counsel of Record (via ECF)